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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

This Document Relates to:

ALL ACTIONS

Case No. 3:23-md-03084-CRB

**STIPULATION AND ~~PROPOSED~~ ORDER  
EXTENDING TIME TO SUBMIT JOINT OR  
COMPETING DEPOSITION AND EXPERT  
DISCOVERY PROTOCOLS**

Judge: Hon. Lisa J. Cisneros  
Courtroom: G – 15th Floor

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**STIPULATION**

**WHEREAS**, on December 28, 2023, the Court established a schedule regarding discovery and initial motions. Pretrial Order No. 5, Dkt. No. 175;

**WHEREAS**, the Court ordered Plaintiffs' Liaison Counsel to meet and confer with Uber regarding, among other things, a pre-trial order regarding the timing of deposition discovery, a protocol for depositions, and expert discovery (the "Deposition and Expert Discovery Protocols") that will be followed in this case. Pretrial Order No. 5, Dkt. No. 175 at 4-5. The Court further ordered the parties to submit joint or competing Protocols by February 23, 2024. *Id.*; and

**WHEREAS**, the parties have exchanged draft Deposition and Expert Discovery Protocols, and met and conferred to discuss the issues in dispute, and agree that extending the deadline to submit a joint or competing Protocols to February 27, 2024, will facilitate the efficient resolution of those disputes and conserve judicial resources;

**THEREFORE**, the parties respectfully request the Court enter the parties' stipulation that:

By February 27, 2024, the parties shall submit a joint or competing Deposition and Expert Discovery Protocols. If the parties submit competing Deposition and Expert Discovery Protocols, each shall submit its own proposed order regarding the timing of deposition discovery, a protocol for depositions, and expert discovery with a memorandum (not to exceed 10 pages) explaining why the Court should adopt that party's proposal.

**IT IS SO STIPULATED.**

1 Dated: February 23, 2024

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9 Dated: February 23, 2024

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7 UNITED STATES DISTRICT COURT  
8 NORTHERN DISTRICT OF CALIFORNIA  
9 SAN FRANCISCO DIVISION  
10

11 IN RE: UBER TECHNOLOGIES, INC.,  
12 PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 3:23-md-03084-CRB

**~~PROPOSED~~ ORDER GRANTING  
STIPULATION EXTENDING TIME TO  
SUBMIT JOINT OR COMPETING  
DEPOSITION AND EXPERT DISCOVERY  
PROTOCOLS**

13 This Document Relates to:  
14 ALL ACTIONS  
15

16  
17 The Court hereby GRANTS the parties' stipulation as follows:

18 By February 27, 2024, the parties shall submit a joint or competing Deposition and Expert  
19 Discovery Protocols. If the parties submit competing protocols regarding the timing of deposition  
20 discovery, a protocol for depositions, and expert discovery, each shall submit its own proposed  
21 order regarding the timing of deposition discovery, a protocol for depositions, and expert discovery  
22 (not to exceed 10 pages) explaining why the Court should adopt that party's proposal.  
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24 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

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26 Date: January 23, 2024

  
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HON. LISA J. CISNEROS  
UNITED STATES MAGISTRATE JUDGE